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25 *Jeff Moss and DEF CON Communications, Inc.*

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 CHRISTOPHER J. HADNAGY, an individual;
1 and SOCIAL-ENGINEER, LLC, a
2 Pennsylvania limited liability company,
3 Plaintiffs,

Case No.: 2:23-cv-01345-CDS-BNW

4 **JOINT STATUS REPORT**

5 v.
6 JEFF MOSS, an individual; DEF CON
7 COMMUNICATIONS, INC., a Washington
8 corporation; and DOES 1-10; and ROE
9 ENTITIES 1-10, inclusive,

10 Defendants.

11 Pursuant to the Court's August 31, 2023 Minute Order (ECF No. 5), Defendants Jeff Moss
12 and DEF CON Communications, Inc. (collectively, "Defendants"), and Plaintiffs Christopher
13 Hadnagy and Social-Engineer, LLC (collectively, "Plaintiffs"), hereby submit this Joint Status
14 Report:

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1 **1. Status of the Action:**

2 On August 9, 2023, Plaintiffs filed their Complaint against Defendants with the Eighth
3 Judicial District Court, Clark County, Nevada (Case No. A-23-875618-C). *See* ECF No. 1-1, at 2.

4 On August 10, 2023, Defendants were served with the Complaint and Summons. *See* ECF No. 11-
5 1, at 2-3.

6 On August 29, 2023, Defendants filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332,
7 1441, and 1446, alleging that there is complete diversity between the parties, and that the amount
8 in controversy exceeds \$75,000.00. *See* ECF No. 1. That same day, Defendants filed their
9 Certificate of Interested Parties. *See* ECF No. 2. Defendants also filed two verified petitions for
10 permission to practice *pro hac vice* for Defendants' counsel, which this Court granted. *See*
11 ECF Nos. 3-4, 7-8.

12 Pursuant to the parties' September 1, 2023, stipulation and order, Plaintiffs granted
13 Defendants a 30-day extension to respond to the Complaint. Accordingly, Defendants' deadline to
14 file a response to the Complaint is October 2, 2023. *See* ECF No. 6. Defendants intend to file a
15 Motion to Dismiss. Accordingly, Plaintiffs' response would therefore be due on October 16, 2023,
16 and Defendants' reply would therefore be due on October 23, 2023. LR 7-2.

17 Defendants also intend to file a Motion to Transfer Venue to the Western District of
18 Washington pursuant to 28 U.S.C. § 1404 approximately one week after filing their Motion to
19 Dismiss. Defendants asked Plaintiff to stipulate to consolidate the briefing on both the Motion to
20 Dismiss and Motion to Transfer, which included a request for an additional extension to file a
21 response to the Complaint, as well as an extended briefing schedule. Plaintiff refused said request
22 to avoid further delay.

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1 **2. Action to be Taken by the Court:**

2 The parties submit that until briefing is complete on the Motion to Dismiss and the Motion
3 to Transfer, no further action is required of this Court.

4 DATED this 29th day of September 2023. DATED this 29th day of September 2023.

5 **RIKLIS LAW, PLLC**

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13 *Attorneys for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of September, 2023, a true and correct copy of the foregoing **JOINT STATUS REPORT** was served by the following method(s):

- Electronic: by submitting electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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